



P.O. Box 6820, Traverse City, MI 49696  
1755 Barlow Street, Traverse City, MI 49686  
Phone (231) 933-4041  
Fax (231) 933-4393

January 10, 2004

**VIA Federal Express**  
Mr. Philip Roycraft  
District Supervisor  
MDEQ-WMD  
Cadillac District Office  
120 W. Chapin  
Cadillac, Michigan 49601-2158

Mr. Michael Stifler  
District Supervisor  
MDEQ-SWQD  
Cadillac District Office  
120 W. Chapin  
Cadillac, Michigan 49601-2158

**Re: Consent Order No. 31-07-02**  
**SECTION V - REPORTING**  
**WILLIAMSBURG RECEIVING & STORAGE**  
**Fourth Quarterly Report: 2003**  
**ISE Project # 02633061-02E**

Gentlemen:

Pursuant to Section 5.2 of the referenced Consent Order (CO), this submittal is presented as the report for fourth quarter, 2003 (Q4-03) CO activities. In accordance with Section 5.2, this report is to be submitted to MDEQ on or before January 10, 2004. The Q1-04 Report will be submitted in accordance with Section 5.2 requirements on or before April 10, 2004.

#### **IV. COMPLIANCE PROGRAM**

##### **Discharge Termination 4.1(a.)**

The requirements of Section 4.1(a.) have all been met. Details regarding progress towards compliance with subparts (1) and (4) may be found in the prior quarterly progress report.

##### **Lagoon Management and Odor Control 4.1(b.)**

Since the effective date of the CO, no known instances of nuisance odor conditions emanating from the WRS plant have been documented by MDEQ Air Quality Division (AQD) pursuant to subpart (5) of this section. All requirements under Section 4.1(b.) have been met by WRS. During the second quarter, 2003 Williamsburg Receiving and Storage received correspondence from MDEQ-AQD documenting resolution of this matter.

Beginning early in second quarter of 2003, the aeration equipment serving the pond became operational again. Its renewed operation was initiated as a precaution to ensure compliance with Consent Order provisions and NREPA Part 55 Rules. On June 6, 2003 representative samples were acquired from the pond following considerable mixing and aeration. Analytical results indicate that the wastewater quality is greatly improved relative to its state one year ago. Both COD and BOD<sub>5</sub> analytical results suggest that aeration and dilution from precipitation have combined to lower oxygen demand. With the onset of seasonally inclement weather, aeration equipment has been idled. Renewed operation in 2004 will depend upon pond wastewater quality and the status of Permit modification efforts.

**Hydrogeologic Work Plan 4.1(c.)**

Compliance with this Section was established in Q4-02 and has been maintained since. A Work Plan Supplement for Hydrogeologic Investigation has been completed and submitted to MDEQ in accordance with CO requirements. Comments received from MDEQ review of the Work Plan and Work Plan Supplement have been integrated into the Investigation, which is underway. Communications were provided to MDEQ (Dated June 16, 2003) in conjunction with Consent Order reporting requirements to verify the correct submittal date of the Hydrogeologic Study Report as identified within the Consent Order.

Outfall sampling required under 4.1(c.)*(iv)* was conducted in May and June of second quarter. Results were provided in the prior quarterly report. Subsequent to the last quarterly report, an additional sample was acquired from one of the outfall pipes. The purpose of the sampling was to acquire an additional analysis for the surrogate parameter BOD<sub>5</sub>. This was desirable to supplement prior analyses, particularly the initial sample result which was reported as non-detectable at an elevated detection limit. With the recent results providing a fourth definitive quantitation for this surrogate analyte, all technical requirements under the CO are met. All laboratory data and outfall monitoring logs will be provided to MDEQ under separate cover along with a petition to cease further monitoring activities for this element of the section 4.1(c.) work plan.

Other progress noted during this reporting period includes the completion and submittal of the Hydrogeologic Study (HS) Report. There are no further work plan or submittal obligations at present under the CO for this compliance section.

**Brine Storage and Secondary Containment 4.1(d.)**

The Secondary Containment Work Plan required under this part was submitted on February 12, 2003. On September 21, 2003 a letter response (dated September 19<sup>th</sup>) from MDEQ to the February 12, 2003 Secondary Containment Work Plan was received. The MDEQ Work Plan response letter indicated that the February 12, 2003 Work Plan is not sufficient and requires a supplement to address MDEQ's concerns within 30 days of receipt of the MDEQ letter. The Supplement to the February 12, 2003 Work Plan was submitted to MDEQ during the reporting period. There are no further work plan or submittal obligations at present under the CO for this compliance section.

**Solid Waste Disposal 4.1(e.)**

Compliance with this part was established before the effective date of the CO. No solid wastes have been burned at the facility.

**V. REPORTING**

All reporting submittals required under the CO have been delivered. The next quarterly progress report will be submitted in accordance with the CO requirements.

Respectfully submitted,

**INLAND SEAS ENGINEERING, INC.**



Andrew Smits, P.E.  
Environmental Engineering  
Department Manager

cc. Mr. Christopher Hubbell- WRS  
Joseph E. Quandt, Esq.- ZKDBT&Q  
Edgar Roy, III Esq.- BFA&R